IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

SHAWN COREY CARTER, *

*

Plaintiff,

*

vs. * Case No. 1:25-cv-00086-TFM-MU

*

ANTHONY BUZBEE, DAVID FORTNEY, ANTHONY G. BUZBEE LP (d/b/a THE BUZBEE LAW FIRM), JANE DOE, et al.

*

Defendants. *

<u>DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE</u> <u>REPLY BRIEFS IN SUPPORT OF MOTIONS TO DISMISS</u>

COME NOW, Defendants Jane Doe, Anthony Buzbee, David Fortney, Anthony G. Buzbee LP, Antigone Curis and Curis Law, PLLC (collectively, "Defendants"), and move this Court for an extension of seven (7) days to the deadline for filing Reply Briefs in support of their Motions to Dismiss. (Docs. 43, 44, and 56.) Defendants' current deadline is August 6, 2025, meaning that if this Motion is granted, Defendants' new deadline would be August 13, 2025. This Motion is unopposed. In support of this Motion, Defendants state as follows:

1. Plaintiff Shawn Corey Carter ("Carter") filed his Memoranda in Opposition ("Response Briefs") to the Motions to Dismiss on July 23, 2025. (Docs. 64-66.) Carter's Response Briefs total approximately 125 pages in length. In addition, certain Response Briefs filed by Carter adopt and incorporate portions of other Response Briefs. Therefore, the Defendants have a considerable volume of briefing to which they must reply.

- 2. Defendants need an additional seven (7) days to properly frame the issues for the Court in their Reply Briefs.
 - 3. Counsel for Carter has advised that Carter is not opposed to this Motion.

WHEREFORE, for the foregoing reasons, Defendants respectfully request an extension of seven (7) days to file their Reply Briefs, making their Reply Briefs due on August 13, 2025.

Respectfully submitted,

J. Blair Newman, Jr. J. BLAIR NEWMAN, JR. (NEWMJ8590) bnewman@mcdowellknight.com Attorney for Jane Doe

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> /s/ Matthew R. Jackson (with permission) MATTHEW R. JACKSON (JACKM7882) AARON G. MCLEOD (MCL053) Attorneys for Anthony Buzbee, David Fortney, and Anthony G. Buzbee LP

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2025, I served a copy of the foregoing upon all counsel of record via this Court's CM/ECF System.

/s/ J. Blair Newman, Jr.
OF COUNSEL